

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: MICHAEL ANTHONY STEWART

Debtor(s)  
JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE

CHAPTER 13

Movant

CASE NO: 1-20-02688-HWV

vs.

MICHAEL ANTHONY STEWART etal  
Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on April 22, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney James K. Jones, Esquire, and respectfully represents the following:

1. An Amended Plan was filed on April 27, 2021.
2. A hearing was held and an Order was entered on February 23, 2022 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ James K. Jones, Esq. \_\_\_\_\_

Id: 39031

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Ste. A, 8125 Adams Drive

Hummelstown, PA 17036

Ph. 717-566-6097

email: jjones@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:   MICHAEL ANTHONY STEWART

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1-20-02688-HWV

**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Ronald Reagan Federal Bldg  
Bankruptcy Courtroom, 3rd Floor  
228 Walnut Street  
Harrisburg, PA 17101

Date: May 25, 2022

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Respectfully submitted,

/s/ James K. Jones, Esq.

ID: 39031

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036

Phone: (717) 566-6097

email: info@pamd13trustee.com

Dated: April 22, 2022

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: MICHAEL ANTHONY STEWART

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS

CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-20-02688-HWV

MICHAEL ANTHONY STEWART etal

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on April 22, 2022, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served electronically

CHAD J JULIUS ESQUIRE  
LAW OFFICES OF LESLIE D JACOBS  
8150 DERRY STREET  
HARRISBURG PA 17111-5212

United States Trustee  
228 Walnut Street  
Suite 1190  
Harrisburg, PA 17101

Served by 1<sup>st</sup> Class Mail

MICHAEL ANTHONY STEWART  
1612 BRIGGS STREET  
HARRISBURG, PA 17103

I certify under penalty of perjury that the foregoing is true and correct.

Date: April 22, 2022

Respectfully submitted,

/s/ Vickie Williams  
for Jack N. Zaharopoulos,  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:       MICHAEL ANTHONY STEWART

CHAPTER 13

CASE NO: 1-20-02688-HWV

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE

Movant

MICHAEL ANTHONY STEWART  
etal

Respondent(s)

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.